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Honorable Thomas O. Rice

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON AT RICHLAND

13 JOHN DOE 1; JOHN DOE 2; JANE DOE
14 1; JANE DOE 2; JANE DOE 3; and all
15 persons similarly situated,

16 Plaintiffs,

17 v.

18 WASHINGTON STATE DEPARTMENT
19 OF CORRECTIONS; CHERYL
20 STRANGE, Secretary of The Department
21 of Corrections, in her official capacity,

22 Defendants.

NO. 4:21-cv-05059-TOR

Declaration of Ethan Frenchman

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24 I, Ethan Frenchman, declare as follows:

25 1. I am admitted to practice before all of the courts of the State of
26 Washington and this Court. I am an attorney at Disability Rights Washington and
27 counsel of record for Plaintiffs in the above-captioned matter. I have personal
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1 knowledge of the facts set forth in this declaration, and, if called as a witness, I
2 could and would testify competently to the matters set forth here.

3 2. On January 30, 2023, Defendants made a document production in this
4 case. I reviewed Defendants' production.

5 3. Included in that production as DEFS16767 to DEFS17350 are records
6 relating to DOC public records request P-17857. I have prepared a PDF extract of
7 records from this production relating to P-17857 with yellow highlights I appended
8 to mark areas of particular significance. That document is attached as **Exhibit B**.
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11 I declare under penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct.
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14 Executed on this 7th day of February, 2023, at Seattle, Washington
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19 Ethan Frenchman, WSBA No. 54255
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